

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DISTRICT DIVISION

UNITED STATES OF AMERICA

Case: 2:17-cr-20662-DML-EAS  
Honorable: David M. Lawson

Vs.

D-1 CELIA WASHINGTON,

**Defendant.**

---

United States Attorneys Office  
Michael R. Bullotta (  
David A. Gardey  
*Attorneys for United States*  
211 W. Fort St., Suite 2001  
(313) 226-9100  
Fax: (313) 226-2311  
[Micahel.bullotta@usdoj.gov](mailto:Micahel.bullotta@usdoj.gov)  
[David.Gardey@usdoj.gov](mailto:David.Gardey@usdoj.gov)

Arnold E. Reed & Associates, P.C.  
Arnold E. Reed (P46959)  
*Attorney for Defendant*  
17515 W 9 Mile Rd Ste 425  
Southfield, MI 48075-4402  
(248) 855-6330  
Fax: (248) 855-6340  
[areed@arnoldreedlaw.com](mailto:areed@arnoldreedlaw.com)

PAMELA L. RICE (P75243)  
Rice Law PLLC  
*Co-Counsel for Defendant*  
23205 Gratiot #303  
Eastpointe, MI 48021  
(855) 726-5292  
Fax: 586-461-2366  
[pam.rice.law@gmail.com](mailto:pam.rice.law@gmail.com)

---

**DEFENDANT'S EXPARTE MOTION TO SEAL MOTIONS IN LIMINE**

NOW COMES DEFENDANT, CELIA WASHINGTON, by and through her attorneys, ARNOLDE E. REED & ASSOCIATES, P.C., and for their Exparte Motion to Seal Motions In Limine.

That the Parties have agreed that certain information regarding the investigation of the above referenced matter should be protected and not disclosed pursuant to a Protective Order entered by this Honorable Court.

That pursuant to the terms of said Protective Order, Defendants have filed the following Motions in Limine and request that said Motions and the accompanying attachments be Sealed pursuant to E.D.M.L. Rule 5.3(b)(2). Said Motions are as follows:

1. Docket No: 16 Defendants 12(b) Motion for Dismissal;
2. Docket No: 17 Defendants Motion to Introduce Recorded Statements;
3. Docket No: 18 Motion to Suppress Defendant's Proffer Agreement  
Statements During the Government's Case in Chief;
4. Docket No: 19 Defendants Motion to Dismiss Indictment;
5. Docket No: 20 Defendant's Motion for Hearing Outside the Presence of  
the Jury to Determine Existence of Conspiracy Before Admission of Hearsay;
6. Docket No: 21 Defendant's 12(b) Motion for Dismissal;
7. Docket No: 22 Defendant's Motion Wiretap Statements;
8. Docket No: 23 Defendant's Motion for Suppress Evidence Obtained by  
Wiretaps.

WHEREFORE, Defendant moves this Honorable Court to Grant her Motion to Seal for the reasons stated herein.

Respectfully submitted,

By: /s/Arnold E. Reed  
ARNOLD E. REED (P46959)  
Arnold E. Reed & Associates P.C.  
*Counsel Attorney for Defendant*  
17515 W 9 Mile Rd Ste. 425  
Southfield, MI 48075-4402  
(248) 855-6330  
Fax: (248) 855-6340  
[areed@arnoldreedlaw.com](mailto:areed@arnoldreedlaw.com)

By: /s/ Pamela L. Rice  
PAMELA L. RICE (P75243)  
Rice Law P.L.L.C.  
*Co-Counsel for Defendant*  
23205 Gratiot #303  
Eastpointe, MI 48021  
(855) 726-5292  
Fax: (586) 461-2366  
[pam.rice.law@gmail.com](mailto:pam.rice.law@gmail.com)

Dated: December 26, 2017

#### **CERTIFICATE OF SERVICE**

I certify that on December 26, 2017, I electronically filed the above *Motion* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

By: /s/Arnold E. Reed  
ARNOLD E. REED (P46959)  
Arnold E. Reed & Associates PC  
Attorney for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DISTRICT DIVISION

UNITED STATES OF AMERICA

Case: 2:17-cr-20662-DML-EAS  
Honorable: David M. Lawson

Vs.

D-1 CELIA WASHINGTON,

Defendant.

---

United States Attorneys Office  
Michael R. Bullotta (  
David A. Gardey  
*Attorneys for United States*  
211 W. Fort St., Suite 2001  
(313) 226-9100  
Fax: (313) 226-2311  
[Micahel.bullotta@usdoj.gov](mailto:Micahel.bullotta@usdoj.gov)  
[David.Gardey@usdoj.gov](mailto:David.Gardey@usdoj.gov)

Arnold E. Reed & Associates, P.C.  
Arnold E. Reed (P46959)  
*Attorney for Defendant*  
17515 W 9 Mile Rd Ste 425  
Southfield, MI 48075-4402  
(248) 855-6330  
Fax: (248) 855-6340  
[areed@arnoldreedlaw.com](mailto:areed@arnoldreedlaw.com)

PAMELA L. RICE (P75243)  
Rice Law PLLC  
*Co-Counsel for Defendant*  
23205 Gratiot #303  
Eastpointe, MI 48021  
(855) 726-5292  
Fax: 586-461-2366  
[pam.rice.law@gmail.com](mailto:pam.rice.law@gmail.com)

---

**DEFENDANT'S BRIEF IN SUPPORT OF DEFENDANT'S EXPARTE  
MOTION TO SEAL MOTIONS IN LIMINE**

In support her Motion to Seal Motions in Limine, Defendant hereby relies upon E.D.M.L.  
Rule 5.3(b)(2).

Respectfully submitted,

By: /s/Arnold E. Reed  
ARNOLD E. REED (P46959)  
Arnold E. Reed & Associates P.C.  
*Counsel Attorney for Defendant*  
17515 W 9 Mile Rd Ste. 425  
Southfield, MI 48075-4402  
(248) 855-6330  
Fax: (248) 855-6340  
[areed@arnoldreedlaw.com](mailto:areed@arnoldreedlaw.com)

By: /s/ Pamela L. Rice  
PAMELA L. RICE (P75243)  
Rice Law P.L.L.C.  
*Co-Counsel for Defendant*  
23205 Gratiot #303  
Eastpointe, MI 48021  
(855) 726-5292  
Fax: (586) 461-2366  
[pam.rice.law@gmail.com](mailto:pam.rice.law@gmail.com)

Dated: December 26, 2017

#### **CERTIFICATE OF SERVICE**

I certify that on December 26, 2017, I electronically filed the above *Order* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

By: /s/Arnold E. Reed  
ARNOLD E. REED (P46959)  
Arnold E. Reed & Associates PC  
Attorney for Defendant